

FWS/RIFO

October 24, 2002

Colonel William J. Bayles
District Engineer
U.S. Army Corps of Engineers District
Rock Island
ATTN: Denny Lundberg
Clock Tower Building, P.O. Box 2004
Rock Island, IL 61204-2004

Dear Mr Lundberg:

This letter provides specific comments on the draft Interim Report in support of Regional Director's letter June 10, 2002. Our review resulted in identification of many points which we would have written differently, but recognizing that the Interim Report is primarily a status report, we have reduced our comments to the following and will work with you on their incorporation into the final document:

Page 11 - 1.1 - These bullets seem inconsistent with guidance and tier one goal and should be corrected.

Response. Bullets have been revised. See revised Sec. 1.1 in final Interim Report.

Page 16 - Suggest that 1.5 should be 1.4.3.

Response. Concur. Revised per suggestion

1.6 (renumbered as 1.5) - We suggest that this section be simply titled as Importance of the River System, as the preceding and subsequent text demonstrates the social, environmental, and economic values derived from the Upper Mississippi River System. The text focuses on navigation, which was only one of ten economic sectors identified in the 1999 report prepared by Industrial Economics, Inc., titled Economic Profile of the Upper Mississippi River Region. That report indicated that river-related revenues generated by the 10 sectors represent about \$145 billion, or 40 percent of the total revenues generated from the river corridor. Although this analysis did not include the Illinois River, it directly highlights the interrelationship between communities, economies, and the ecosystem later referenced on page 36 of the draft report.

Response. Concur. Revised per suggestion.

Page 39 - 2.3.2 - We suggest the last bullet be: “Develop a plan for operating and maintaining the system in a way that sustains both navigation and ecosystem benefits,” or “Develop a plan for operating and maintaining the navigation system that supports ecosystem and flood damage reduction goals”.

Response. Revised per first suggestion.

Page 52 - 2.4.2.2.3 - This section lacks reference to damaging effects of training structures on freshwater mussels identified by the Bureau of Biological Survey, provided in the 1932 Chief’s Report. This would be an appropriate counterpoint to your last sentence of this discussion.

Response. Text included: Wing dikes and other submerged structures provide aquatic habitat, substrate, and structure important to many aquatic invertebrates and fishes, **but their initial construction and alteration of sedimentation patterns adversely affected freshwater mussels in some channel border locations.**

Page 57 - 2.4.4.4.7 - In the first paragraph, second sentence, strike: “was rather extensive because” and replace with “included”.

Response. Revised. The analysis included 12 river reaches, 37 pools/reaches, and 33 land cover and geomorphic area classes.

The remainder of the paragraph speaks largely of fisheries issues. The broad generality of habitat decline from north to south is misleading in that from Pool 14 northward, the narrower floodplain was inundated by the navigation system, is primarily in public ownership, and is managed primarily for fish and wildlife benefit. Southward, the floodplain has been converted from forest, wet meadow, marsh, and grassland to agriculture, is in private ownership, and is managed primarily for agricultural production. Agricultural landcover can provide seasonal benefit to some desirable species, but lacks the diversity that would be supported by earlier historic landcover. Longitudinal and latitudinal connectivity between the mainstem river proper and off-channel habitats is advantageous in its context as a tool to achieve resource management objectives. We do not consider connectivity a management objective in and of itself, due to the variety of potential negative factors including sediment distribution and dispersal of nuisance aquatic species.

Response. Revised. To summarize, the greatest habitat diversity and quality occurs north of Pool 14 due primarily to the existence of a connected floodplain and ample public land. Wildlife and fish habitat abundance and quality generally degrades in a downstream direction because of increasing proportions of private crop lands in the floodplain and adverse effects of sedimentation in aquatic habitats. One common impact throughout the river system is that water level regulation has altered natural hydrology which contributes to aquatic habitat degradation.

Page 74 - 2.4.3.2 - The reader would benefit from a revision of this section that describes more thoroughly the expected continued decline of the ecosystem in the without project description.

We suggest you review and utilize applicable portions of the Service's April 2002 draft Fish and Wildlife Coordination Act Report for the System Study, as well as the Service's 2000 Final Biological Opinion, for continued operation and maintenance of the 9-foot channel project.

Response. This section is meant to introduce the concept of O&M for the ecosystem, not explain the future without condition (p. 79). Expanding the future w/o project would belong here if deemed necessary.

Page 75 - 2.4.3.2 - The slope of the curve depicting cumulative effects should be reversed to reflect more intuitively the downward trajectory in resource conditions over time and should be re-labeled "Resource Condition".

Response. Concur.

Page 79 - 2.4.3.4 - Replace the first paragraph with: "Natural resource managers were asked to express their desired future conditions for river resources during the first habitat needs assessment (HNA). As part of this exercise, it was necessary to assess the likely future without condition, based on their individual experience and sphere of knowledge. While their response indicated that there was inadequate systemic data to compare or contrast rates of change river-wide, they did indicate a continued downward trend in resource condition in areas they were familiar with. These changes were largely due to impoundment effects from water level regulation, sediment redistribution, and loss of floodplain cover types".

Response. Revised per suggestion.

In the second paragraph, third sentence, replace "would" with "will".

Response. Revised per suggestion.

Page 80 - For the first paragraph, last sentence, we suggest a rewrite: "Increased efforts to reverse impoundment effects on aquatic habitats, vegetation succession, and forest health will be required to sustain ecosystem values".

Response. Revised per suggestion.

Pages 100-105 - This discussion would benefit from clear definitions of restoration and enhancement and how they are perceived by the Corps as applied to mitigation identified in previous phases of the study, as well as measures yet to be identified in the feasibility phase.

Response. Definitions of restoration and enhancement are tied to authority, policy and funding considerations. These will need to be clearly defined as we move into authority and funding discussions in the feasibility study.

Page 110 - Figure 31 - See preceding comment regarding page 79.

Response. Concur.

Page 113 - references non-existent section. We assume it must be 2.5.1.1.7.

Response. References updated.

Pages 115-116 - 3.2 - Please use the following language relative to authorizations for the U.S. Fish and Wildlife Service:

“The U.S. Fish and Wildlife Service is Congressionally authorized to manage national fish and wildlife refuges located throughout the Upper Mississippi River System. Each refuge was established through separate legislation, so there are many statutes pertaining to the refuge system. These lands include those covered by the 2001 Amended Cooperative Agreement between the Department of the Army, Corps of Engineers and the Department of the Interior, U.S. Fish and Wildlife Service, for lands acquired by the Corps for the navigation project and made available to the Service (and subsequently three UMR states) for management “..consistent with the National Wildlife Refuge System”. Under the Endangered Species Act, the Service is also authorized by Congress to undertake prelisting, listing, and recovery activities for federally threatened and endangered species, in partnership with the states, federal agencies and private organizations and individuals. There are currently seven federally listed species in the UMRS. The Service is highly involved with recovery activities for these species, especially the Higgins eye pearly mussel and the pallid sturgeon. The Service also is very active in cooperative, interagency management actions to benefit interjurisdictional fishes, such as the paddlefish. The Service is also very active in the implementation of its partners for Fish and Wildlife Program, which is focused on habitat restoration on private lands within the mainstem UMRS and its watersheds. The Service also provides water quality and contaminant technical assistance to US EPA and the states. The Service is also responsible for identifying, in cooperation with the states, adverse impacts to fish and wildlife and their habitats, as well as needed mitigation that might result from Federal civil works projects, under the Fish and Wildlife Coordination Act.”

The primary Service implementation issues are related to limited funding due to multiple priorities.

Response. Revised per suggestion.

Page 121 - System Authority diagram - We feel that the diagram should contain just 3 boxes branched from the System Authority box: Navigation, Ecosystem Stewardship, and Flood Damage Reduction. Each one of these system purposes or activities would be subtended by their own branched array of existing or needed programs.

Response. Section 3 has been revised and diagram deleted.

Page 122 - Ecosystem Restoration - The following suggestions were originally addressed to the

language provided under earlier drafts:

Ecosystem Stewardship versus Restoration - Ecosystem stewardship is a broad category that includes maintenance, restoration, and enhancement of ecological conditions desired by stakeholders and/or necessary for the conservation of trust resources. Responsibility for ecosystem stewardship is incumbent on all stakeholders, but the Federal and state agencies have roles specific to their authorities and specific to terms under any active interagency agreements. For instance, a General Plan covers most of the lands acquired by the Corps for the navigation project which have been excess to project operations needs, beyond flooding to create the pools.

These lands, which are co-mingled with Fish and Wildlife Service lands, are managed under the provisions of a Cooperative Agreement by the Service and the states of Iowa, Illinois and Missouri, as a part of the National Wildlife Refuge System. These agreements have been beneficial to the Corps over the past 60 years due to savings accrued by the Corps through these partnerships with agreement agencies for the approximately 176,000 acres in the General Plan. Current ecological restoration needs are undoubtedly lessened by the past efforts on these lands by the partner agencies with assistance from the Corps. We anticipate that these partner contributions will continue, however, additional fiscal capabilities need to be sought.

Other comments relative to institutional arrangements in the conclusions of the draft Interim Report were provided in our previous correspondence under our Regional Director's signature. Thank you for the opportunity to comment. We look forward to completing the Interim Report and moving ahead with the Feasibility Study. For questions regarding this letter, please contact Bob Clevensine at 309/793-5800 ext 521.

Sincerely,

Richard C. Nelson
Supervisor

cc: FWS/RO (Wooley, Lewis, Kauffeld)
MTNWR (Steinbach)
UMRNWFR (Lindell)
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